

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**Subject to Harvard's Motion to File
Under Seal [Dkt. 72]**

DECLARATION OF FELICIA H. ELLSWORTH

I, Felicia H. Ellsworth, hereby state under oath:

1. I am a member in good standing of the bar of the Commonwealth of Massachusetts and this Court, and am a partner at the firm of Wilmer Cutler Pickering Hale and Dorr LLP. I am one of the counsel representing the Defendant President and Fellows of Harvard College (Harvard Corporation) ("Harvard") in the above-captioned matter. I submit this declaration in connection with Harvard's Proposed Reply Memorandum In Support of the Motion to Stay.

2. Attached hereto as Exhibit A is a true and accurate copy of excerpts of Plaintiff's Objections and Responses to Defendant's First Set of Interrogatories, which Students for Fair Admissions, Inc. ("SFFA") served upon Harvard on July 2, 2015.

3. Attached hereto as Exhibit B is a true and accurate copy of Plaintiff's Supplemental Response to Interrogatory No. 5, which SFFA served upon Harvard on July 2, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, July 21, 2015.

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth (BBO #665232)

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Dated: July 21, 2015

*Counsel for Defendant President and
Fellows of Harvard College*

EXHIBIT A

**(Exhibit Subject to Defendant President and Fellows
of Harvard College's Motion to File Under Seal)**

EXHIBIT B

**(Exhibit Subject to Defendant President and Fellows
of Harvard College's Motion to File Under Seal)**